REMARKS

1) Claim Rejections — 35 U.S.C. § 102

Claims 25, 27 and 29 are rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Publication No. 2002/0122598 to Ribas-Corbera et al. (hereinafter "Ribas-Corbera"). "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). With the above requirement in mind, Applicants respectfully traverse these rejections.

Applicants have amended independent claim 25 to further define the invention. With respect to amended independent claim 25, Applicants respectfully submit that Ribas-Corbera fails to disclose at least one claim limitation, especially the limitation regarding "extracting a selected number of layers from the inventory based on a bit rate requirement to generate the compressed data." The Examiner indicates that Ribas-Corbera teaches extracting with the use of an encoder a selected number of layers/blocks (the non-discarded blocks) to generate the compressed data. *See Office Action dated April 16, 2007, page 2.* Applicants respectfully disagree.

In Ribas-Corbera, an initial block-skipping threshold is computed for all blocks. *See paragraph [0067].* If the energy of the block with the lowest energy among the non-discarded blocks is below the threshold value T, then the lowest energy block is discarded and the threshold value T is recomputed for the remaining non-discarded blocks and the process is repeated. *See paragraph [0070].* When the energy of the lowest energy block is greater than the threshold value T, no additional blocks are discarded and the remaining blocks are encoded by

block transform. *See paragraph [0073]*. In sum, all blocks whose energy (in terms of standard deviation) is below threshold value T are discarded. *See paragraph [0055]*.

In contrast, amended independent claim 25 recites, among other things, "extracting a selected number of layers from the inventory based on a bit rate requirement to generate the compressed data." The layers are selected based on a bit rate requirement, not based on the lowest energy block of the remaining non-discarded blocks. Accordingly, amended independent claim 25 is novel and patentably distinguishable over Ribas-Corbera.

Regarding dependent claim 26, it depends from independent claim 25, which is believed to be patentable, and thus dependent claim 26 should also be novel and patentably distinguishable over Ribas-Corbera.

With respect to independent claim 27, it comprises limitations that are similar to the limitations of independent claim 25, which is believed to be patentable as explained above. Accordingly, independent claim 27 is also novel and patentably distinguishable over Ribas-Corbera.

Regarding dependent claim 28, it depends from independent claim 27, which is believed to be patentable, and thus dependent claim 28 should also be novel and patentably distinguishable over Ribas-Corbera.

With respect to independent claim 29, it comprises limitations that are similar to the limitations of independent claim 25, which is believed to be patentable as explained above. Accordingly, independent claim 29 is also novel and patentably distinguishable over Ribas-Corbera.

Regarding dependent claim 30, it depends from independent claim 29, which is believed to be patentable, and thus dependent claim 30 should also be novel and patentably distinguishable over Ribas-Corbera.

2) Claim Rejections — 35 U.S.C. § 103

Claims 1, 12 and 22 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Publication No. 2002/0099853 to Tsujii et al. (hereinafter "Tsujii") in view of Ribas-Corbera. To establish a prima facie case of obviousness, certain criteria must be met. One such criterion requires the prior art reference or references, when combined, to teach or suggest all the claim limitations. With the above requirements in mind, Applicants respectfully traverse these rejections.

With respect to independent claim 1, Applicants respectfully submit that Tsujii, Ribas-Corbera or both fail to teach or suggest at least one claim limitation, especially the limitation regarding "entropy coding a first number of layers to generate a first description of compressed data." The Examiner indicates that Tsujii teaches entropy coding layers of the data coefficients using an entropy coder (4). *See Office Action dated April 16, 2007, page 4.* Applicants respectfully disagree.

In Tsujii, FIGS. 5A and 5B are schematic diagrams illustrating the operation of the entropy encoder 4. *See paragraph [0070].* The entropy encoder 4 expands the inputted quantized index into bit planes and performs two-level arithmetic coding on each bit plane. *See paragraph [0069].* The two-level arithmetic coding is performed beginning with the most significant bit plane and ending with the least significant bit plane. *See paragraph [0081].* In the above process, when a first non-zero bit is detected during the scanning of a bit plane, the corresponding code of the quantized code is immediately entropy-coded. *See paragraph [0074].*

The coding is performed in the resolution-scalable fashion or the SNR-scalable fashion. *See paragraph [0075].*

In contrast, independent claim 1 recites, among other things, "entropy coding a first number of layers to generate a first description of compressed data." Tsujii does not use entropy coding on a number of layers. Rather, in Tsujii, when a first non-zero bit is detected, the corresponding code of the quantized code is immediately entropy-coded. *See paragraph [0074].* Tsujii does not perform entropy coding on a number of layers but rather performs entropy coding on the quantized code. In Tsujii, a first layer for example represents a most significant bit plane. Ribas-Corbera also fails to teach or suggest this limitation.

Independent claim 1 also recites, "grouping the transform coefficients into layers based on the energy distribution." In Tsujii, the bits are quantized and then immediately entropy coding. *See paragraphs [0071-0074].* Tsujii does not mention anything about grouping the transform coefficients into layers based on the energy distribution. Ribas-Corbera also fails to teach or suggest this limitation. Accordingly, independent claim 1 is non-obvious and patentably distinguishable over Tsujii in view of Ribas-Corbera.

Regarding dependent claims 2-11, they depend from independent claim 1, which is believed to be patentable, and thus dependent claims 2-11 should also be non-obvious and patentably distinguishable over Tsujii in view of Ribas-Corbera.

With respect to independent claim 12, it comprises limitations that are similar to the limitations of independent claim 1, which is believed to be patentable as explained above. Accordingly, independent claim 12 is also non-obvious and patentably distinguishable over Tsujii in view of Ribas-Corbera.

Regarding dependent claims 13-21, they depend from independent claim 12, which is believed to be patentable, and thus dependent claims 13-21 should also be non-obvious and patentably distinguishable over Tsujii in view of Ribas-Corbera.

With respect to independent claim 22, it comprises limitations that are similar to the limitations of independent claim 1, which is believed to be patentable as explained above. Accordingly, independent claim 22 is also non-obvious and patentably distinguishable over Tsujii in view of Ribas-Corbera.

Regarding dependent claims 23 and 24, they depend from independent claim 22, which is believed to be patentable, and thus dependent claims 23 and 24 should also be non-obvious and patentably distinguishable over Tsujii in view of Ribas-Corbera.

New claims 31-41 comprise limitations that are similar to the limitations of claims 1-11, which are believed to be patentable as explained above. Accordingly, new claims 31-41 are also non-obvious and patentably distinguishable over Tsujii in view of Ribas-Corbera.

CONCLUSION

Claims 1-41 are presently standing in this patent application. In view of the foregoing amendments and remarks, each and every point raised in the Office Action mailed April 16, 2007 has been addressed on the basis of the above amendments and remarks. Applicants believe all of the claims currently pending in this patent application to be in a condition for allowance. Reconsideration and withdrawal of the rejections are respectfully requested. However, should the Examiner believe that direct contact with Applicants' attorney would advance the prosecution of this patent application; the Examiner is invited to telephone the undersigned attorney at the number given below.

Please charge any fees or overpayments that may be due with this response to Deposit Account No. 17-0026.

Respectfully submitted,

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